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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAMSARA INC.,

Plaintiff,

v.

MOTIVE TECHNOLOGIES, INC.,

Defendant.

CASE NO. 3:24-cv-06049-JD

**DEFENDANT MOTIVE’S RESPONSE TO
PLAINTIFF SAMSARA’S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY’S MATERIAL SHOULD BE
SEALED [ECF 124]**

Judge: Hon. James Donato
Courtroom: Courtroom 11, 19th Floor

Pursuant to Civil Local Rule 79-5(f)(3), Defendant Motive Technologies, Inc. submits this response to Plaintiff Samsara Inc.'s Administrative Motion to Consider Whether Another Party's Material Should Be Sealed. ECF 124.

As the Court is aware, Samsara's original Motion to Confirm Arbitral Award and Enter Judgment Thereon (ECFs 112-114) was 7 pages overlong in violation of the Court's standing order. After Motive pointed out this error, rather than re-noticing its motion Samsara submitted a 15-page version of opening brief, which it characterized as a "supplemental exhibit" rather than a new filing (ECFs 119-121). Samsara's "supplemental exhibit" was filed 3 days before Motive's opposition was due, and Motive accordingly objected. ECF 122. Samsara responded to Motive's objection by filing a redline comparing Samsara's original motion with its revised motion (ECF 124-3)—which itself now must be sealed for the same reasons Motive moved to seal the original (ECFs 117-118) and revised (ECFs 130-131) pleadings.

In the event the Court does not choose to seal the redline comparison (ECF 124-3) in its entirety, the Court should at least seal the following portions:

Document/Exhibit	Reason for Sealing
<p>Samsara's redline comparison between the original and shortened Petition to Confirm Arbitral Award and Enter Judgment Thereon [ECF 124-3]</p> <p>Pgs. ii:7-9, ii:14, iii:2-3, iii:8 1:3-17, 1:19-20, 2:1-10, 2:16-18, 2:19-21, 3:1-7, 4:19-26, 5:1-13, 5:15-20, 6:3-9, 6:11-27, 7:1-22, 7:26, 8:1-4, 8:7-11, 8:17-20, 8:22-24, 8:26, 9:1-9, 9:22-24, 10:4-13, 10:22-26, 11:1-13:9, 13:11-14:13, 14:19-15:10, 15:24-27, 16:15, 16:21-23, 16:26, 17:1-17, 17:19-22, 18:6-20:17, 20:19-22, 20:24-27, 21:8-14, 21:16-27, 22:3-4.</p>	<p>Contains information relating to confidential arbitration. ECFs 117-1 to 117-4, 118-2 to 118-5, 130-1, 131-1 to 131-4 (Wilson Dec. ¶¶ 2-5, Exs. A-C).</p> <p>Also contains material that is Highly Confidential because it concerns or relates to Motive's competitive intelligence gathering efforts, business plans, and procedures. ECFs 118-1, 131-5 (Solomon Dec. ¶¶ 3-4, 6-7).</p>

Accordingly, Motive respectfully requests that the Court seal ECF 124-3.

1 DATED: May 28, 2025

By: /s/ David S. Bloch

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